

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 4:24-CV-92
	)	
ALLIANCE PARK LLC; BRICKYARD	)	
PLACE LLC; CENTEX	)	
MANAGEMENT, LLC; DEERWOOD	)	
POINT LLC; HONEY PARK LLC;	)	
MARIAH MARIE LLC; UNION GL	)	
PARK LLC; GOVERNORS	)	
MANAGEMENT LLC; and	)	
THE PRUDENTIAL REALTY LLC;	)	
	)	
Respondents.	)	
	)	

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**RESPONDENTS' ANSWER TO PETITION FOR SUMMARY  
ENFORCEMENT OF CIVIL INVESTIGATIVE DEMANDS**

Respondents Alliance Park LLC, Brickyard Place LLC, Centex Management, LLC, Deerwood Point LLC, Honey Park LLC, Mariah Marie LLC, Union GL Park LLC, Governors Management LLC, and The Prudential Realty LLC (“Respondents”), by and through undersigned counsel, answers the United States’ Petition for Summary Enforcement of Civil Investigative Demands (“Petition”) as follows:

**ANSWER**

To the extent a response is required, Respondents deny all allegations contained in the unnumbered summary paragraph of the Petition.

1. Paragraph 1 contains a legal conclusion to which no response is necessary.
2. Paragraph 2 contains a legal conclusion to which no response is necessary.

**PARTIES**

3. Paragraph 3 contains a legal conclusion to which no response is necessary.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.

**ISSUANCE AND SERVICES OF THE CIDs**

13. Respondents are without sufficient information to admit or deny the remaining allegations of Paragraph 13.

14. Respondents admit that CIDs were issued on or about October 19, 2023.

Respondents are without sufficient information to admit or deny the remaining allegations of Paragraph 14.

15. Respondents admit that CIDs were issued on or about November 1, 2023.

Respondents are without sufficient information to admit or deny the remaining allegations of Paragraph 15.

16. Respondents are without sufficient information to admit or deny Paragraph 16.

17. Respondents are without sufficient information to admit or deny Paragraph 17.

18. Respondents are without sufficient information to admit or deny Paragraph 18.

19. Respondents are without sufficient information to admit or deny Paragraph 19.

20. Respondents are without sufficient information to admit or deny Paragraph 20.

21. Respondents are without sufficient information to admit or deny  
Paragraph 21.

22. Respondents are without sufficient information to admit or deny  
Paragraph 22.

23. Respondents are without sufficient information to admit or deny  
Paragraph 23.

24. Respondents are without sufficient information to admit or deny  
Paragraph 24.

**RESPONDENTS REFUSE TO RESPOND**

25. Admitted.

26. Admitted.

27. Respondents admit that they declined to respond to the CID  
interrogatories on the basis of the Fifth Amendment to the United States  
Constitution. The remainder of Paragraph 27 is denied.

28. Admitted.

29. Admitted.

30. Denied

31. Denied.

Any and all allegations contained in the United States' Petition not expressly  
admitted above are hereby denied.

WHEREFORE, Respondents respectfully requests that none of the requested relief be entered against them.

Respectfully submitted, this 22<sup>nd</sup> day of July, 2024.

CHILIVIS GRUBMAN, LLP

/s/ Scott R. Grubman

Scott R. Grubman | Georgia Bar No. 317011

Brittany M. Cambre | Georgia Bar No.

350793

(Pro Hac Vice forthcoming)

Brandi Z. Murrain | Georgia Bar No.167467

(Pro Hac Vice forthcoming)

1834 Independence Sq.

Atlanta, GA 30338

P: (404) 233-4171

F: (404) 261-2843

[sgrubman@cglawfirm.com](mailto:sgrubman@cglawfirm.com)

[bcambre@cglawfirm.com](mailto:bcambre@cglawfirm.com)

[bmurrain@cglawfirm.com](mailto:bmurrain@cglawfirm.com)

*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 22, 2024, I electronically filed the foregoing Answer with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

Bradford C. Patrick, Esq.  
Assistant United States Attorney  
U.S. Attorney's Office  
P.O. Box 8970  
Savannah, GA 31412  
bradford.patrick@usdoj.gov

/s/ Scott R. Grubman

Scott R. Grubman  
Georgia Bar No. 317011  
Chilivis Grubman, LLP  
1834 Independence Sq.  
Atlanta, GA 30338  
P: (404) 233-4171  
F: (404) 261-2843  
[sgrubman@cglawfirm.com](mailto:sgrubman@cglawfirm.com)